

February 4, 2002

ExxonMobil
Exploration

Department of the Interior
Minerals Management Service
381 Elden Street, MS 4024
Herndon, Virginia 20170-4817

Attention: Rules Processing Team

**Re: Comments on the Proposed Rule
Suspension of Operations for
Exploration Under Salt Sheets
Outer Continental Shelf**

Ladies and Gentlemen:

ExxonMobil Exploration Company, a division of Exxon Mobil Corporation, submits this letter in response to the Mineral Management Service's call for comments published January 9, 2002, in the Federal Register (pp.1171 et seq.) regarding the proposed rule "Oil and Gas Sulphur Operations on the Outer Continental Shelf; Suspension of Operations for Exploration Under Salt Sheets" ("Proposed Rule").

In 2000, the MMS promulgated a new regulation providing for the extension of lease terms for sub-salt exploration in cases where the lessee has drilled a well on a lease during the primary term but needs additional time to process geophysical data before drilling another well. This was an excellent first step in addressing the complexities facing companies pursuing exploration objectives in sub-salt areas of the Gulf of Mexico ("GOM"). The Proposed Rule addresses a situation where the lessee has conducted timely analysis and interpretation of the geophysical data but, due to the complexity of the salt sheet, needs additional time to complete the geophysical analysis prior to drilling. Under the Proposed Rule, an SOO could be granted for a period not to exceed three years where additional sub-salt geophysical interpretations is required. In light of the time-consuming perplexities involved in geophysical analysis of sub-salt data, the extension allowed by the Proposed Rule will encourage technically challenging but potentially rewarding sub-salt exploration.

At first glance, the Proposed Rule appears limited to only those leases located in the Western Gulf of Mexico. However, Mr. Mike Hrabec of the MMS has advised that, for the purposes of the Proposed Rule, the term "Western Gulf of Mexico" mean all OCS areas of the Gulf of Mexico except those the Director decides are adjacent to the State of Florida and, further, that the Western Gulf of Mexico is not the same as the Western Planning Area, an area established for OCS lease sales. Accordingly, the Proposed Rule would be applied to leases in both the Western and Central Planning Areas. ExxonMobil believes that it would be helpful if the final rule made this clear.

Additionally, ExxonMobil believes that both the technical complexities as well as the capital commitment required to successfully explore the most promising non-deepwater GOM exploration areas (e.g. sub-salt, deep gas) require more than the traditional five (5) year primary term under which most non-deepwater oil and gas leases are currently issued. ExxonMobil encourages the MMS to consider granting a primary term of ten (10) years in all new GOM leases.

ExxonMobil appreciates the opportunity to provide these comments on the Proposed Plan. Please do not hesitate to contact J. Byron Morris at 281.654.7051 should you have any questions or require any assistance.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Parks A. DeGo".